

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

\$53,082,824.19 IN U.S. CURRENCY,

*Defendant.*

No. 19-cv-01930

**BANCO SAN JUAN INTERNACIONAL'S  
MOTION TO RESTRICT ITS REPLY BRIEF IN SUPPORT OF  
ITS MOTION TO LIFT THE STAY OF CIVIL FORFEITURE PROCEEDINGS**

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*Counsel for Banco San Juan Internacional, Inc.*

TO THE HONORABLE COURT:

COMES NOW, Banco San Juan Internacional, Inc. (“BSJI”), by and through its undersigned attorneys, respectfully files this motion to restrict *Banco San Juan Internacional’s Reply Brief in Support of Its Motion to Lift the Stay of Civil Forfeiture Proceedings* (the “Filing”), for the reasons set forth below:

In compliance with the requirements of this Court’s Standing Order No. 9, dated January 30, 2013, BSJI respectfully requests that the Filing be accepted by the Court for filing with the following level of restriction: *SELECTED PARTIES: Limiting viewing to the attorneys for Claimant, attorneys for the Respondent, and the Court.*

BSJI is filing with the requested level of restriction, because the Filing contains information that is currently under seal in a related, miscellaneous action (No. 19-mc-263), and that seal has not yet been removed. Thus, BSJI must file its Motion and exhibits as restricted to ensure that sealed material is not made publicly available. BSJI will separately file a redacted version of its Motion so that the public may have access to all information to which it is entitled.

WHEREFORE, BSJI respectfully prays the Court accept and file the Filing under the requested restriction level, and issue an ORDER directing the Filing to remain under such restriction level until further order by the Court.

Dated: January 8, 2020

/s/ Guillermo Ramos Luiña

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**CERTIFICATE OF SERVICE**

I certify that the foregoing was filed on January 8, 2020 with the Clerk of Court using the CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

/s/ Abbe David Lowell  
Abbe David Lowell